

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

<b>BRIAN ERSKINE</b> , an individual,	)	Case No. 3:23-mc-00815
	)	
Plaintiff,	)	
	)	<b>WRIT OF GARNISHMENT</b>
v.	)	
	)	
<b>FORREST BURKE FENN</b> , deceased; and	)	
<b>ZOE FENN OLD</b> , in her capacity as Personal	)	
Representative of the Estate of Forrest Burke	)	
Fenn,	)	
	)	
Defendants,	)	
	)	
<b>MORGAN STANLEY PRIVATE BANK,</b>	)	
<b>NATIONAL ASSOCIATION,</b>	)	
	)	
Garnishee.	)	
	)	

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**TO: MORGAN STANLEY PRIVATE BANK, NATIONAL ASSOCIATION,**  
760 SW 9<sup>th</sup> Ave., Ste. 2100  
Portland, OR 97205

You are now a Garnishee. AS A GARNISHEE, YOU NEED TO KNOW THE FOLLOWING:

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Brian Erskine (who is called the “**Debtor**”) owes money to Forrest Burke Fenn, deceased, and Zoe Fenn Old, in her capacity as Personal Representative of the Estate of Forrest Burke Fenn (who is called the “**Creditor**”). A judgment was entered against the Debtor for the debt, or the debt otherwise became subject to garnishment, on September 21, 2023. The Debtor’s employer identification number, or the final four digits of the Debtor’s Social Security number, is xxx-xx-5432 (*insert if known*).

The amount subject to garnishment is **\$ 111,994.71**.

This writ garnishes all of the following:

- Wages that you owe the Debtor at the time this writ is delivered to you, and all wages that the Debtor earns during the 90-day period following the date on which you receive this writ.
- All property of the Debtor (including money) that is in your possession, control or custody at the time this writ is delivered to you.
- All debts that you owe the Debtor at the time this writ is delivered to you, whether or not payment is due on the debt at the time you receive this writ.

YOU MUST ANSWER THIS WRIT BY COMPLETING THE ATTACHED GARNISHEE RESPONSE WITHIN THE TIME ALLOWED BY LAW, WHETHER OR NOT YOU HOLD ANY OF THE DEBTOR’S PROPERTY OR OWE ANYTHING TO THE DEBTOR. IF YOU DO NOT TRUTHFULLY ANSWER THIS WRIT, OR YOU DO NOT DELIVER MONEY OR PROPERTY WHEN YOU ARE REQUIRED TO DO SO, YOU WILL BE LIABLE TO THE CREDITOR.

If you have questions, you should contact an attorney. Court employees cannot give you legal advice. The Creditor’s attorney cannot give you legal advice.

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A writ of garnishment may be issued only by the court administrator, by the attorney for the Creditor or by a person who is specifically authorized by law to issue garnishments. This writ is issued by (check one):

  X   The court administrator

       The attorney for the Creditor

       Other authorized issuer: \_\_\_\_\_

Name and title: \_\_\_\_\_

Statutory authority to issue writ: \_\_\_\_\_

\*\*\*

This writ is valid only if it has been delivered to you within 60 days after the date of issuance. If the court administrator is issuing this writ, the date of issuance is the date the court administrator signs the writ (see “COURT SEAL” below). If this writ is issued by any other person, the date of issuance is the date on which the issuer signs the certification (see “CERTIFICATION” below).

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**IMPORTANT ADDRESSES** (*see Step 2 of Instructions to Garnishee form*)

(Court Administrator)

U.S. District Court, District of Oregon  
Portland Division  
1000 SW Third Ave.  
Portland, OR 97204

(Debtor)

Name: Brian Erskine  
Telephone number (if known): 928-227-0395  
Street Address: 1338 Sabatina St, Prescott, AZ 86301-7402

(Garnishor; *check one*)

— Creditor (*Must be filled in if the court administrator issues writ.*):  
Name: Forrest Burke Fenn, deceased, and Zoe Fenn Old, in her capacity as  
Personal Representative of the Estate of Forrest Burke Fenn  
Street Address: c/o Joshua D. Stadtler, Dunn Carney LLP  
851 SW 6<sup>th</sup> Ave., Suite 1500, Portland, OR 97204

— Attorney for Creditors:  
Name: Joshua D. Stadtler  
Street Address: Dunn Carney LLP, 851 SW 6<sup>th</sup> Ave., Suite 1500, Portland, OR 97204  
Telephone number: 503-224-6440  
Oregon State Bar Number: 131613


— Other Authorized Issuer of Writ:

Name: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
Telephone number: \_\_\_\_\_

## CERTIFICATION

*(The following certification must be signed by the Creditor if this writ is issued by the court administrator. In all other cases, the following certification must be signed by the person issuing the writ.)*

I certify that I have read this writ of garnishment and to the best of my knowledge, information and belief, there is good ground to support issuance of the writ, and the amount indicated as subject to garnishment is lawfully subject to collection by this writ.

DocuSigned by:  
  
A0D7CD43F28544B...  
Zoe Fenn Old, in her capacity as Personal  
Representative of the Estate of Forrest Burke Fenn

3/1/2024

Dated

## COURT SEAL

*(To be completed only if this writ is issued by the court administrator. The writ must be stamped by the court administrator.)*

The court administrator has not calculated any amounts on the writ and is not liable for errors made in the writ by the Creditor.

Issued by the court administrator this \_\_\_\_\_, 2024.

## COURT ADMINISTRATOR

By: \_\_\_\_\_